

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 1
	APPL. NO. 533073	DATE 10/31/2014
	PROCESSED BY LC02	CHECKED BY

TITLE V PERMIT RENEWAL

COMPANY NAME AND ADDRESS:

Pasadena City College (Facility ID 18960)
1570 E. Colorado Blvd.
Pasadena, CA 91106

EQUIPMENT LOCATION:

1570 E. Colorado Blvd.
Pasadena, CA 91106

BACKGROUND:

This is an existing facility that is a junior college. The facility has the following permitted equipment.

Application #	Permit #	Equipment description
366438	F43891	BOILER (<5 MMBTU/HR) NATURAL GAS
366441	F43892	BOILER (<5 MMBTU/HR) NATURAL GAS
233859	D68245	BOILER (>20-50 MMBTU/HR) NATURAL GAS
246741	D64777	BOILER (>20-50 MMBTU/HR) NATURAL GAS
273434	D71176	BOILER (>20-50 MMBTU/HR) NATURAL GAS
233254	D43685	I C E (50-500 HP) EM ELEC GEN-NAT GAS
290045	F4966	I C E (50-500 HP) EM ELEC GEN-DIESEL
298164	D87143	I C E (50-500 HP) EM ELEC GEN-DIESEL
375255	F43876	I C E (50-500 HP) EM ELEC GEN-DIESEL
375256	F44715	I C E (50-500 HP) EM ELEC GEN-DIESEL
398896	F62166	I C E (50-500 HP) EM ELEC GEN-DIESEL
357839	F32520	SPRAY BOOTH PAINT AND SOLVENT
443122	F90111	PRESSURE WASHER

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 2
	APPL. NO. 533073	DATE 10/31/2014
	PROCESSED BY LC02	CHECKED BY

Three larger boilers were removed since the permit was issued on August 23, 2007. They are shown in the above table with the strike-out font.

The facility was issued its revised Title V permit on August 23, 2007. The Title V permit will expire on August 22, 2012. The facility is required to submit an application to renew the Title V permit at least 180 days before the permit expiration date. The facility submitted this Title V renewal application on February 9, 2012 (deemed complete on April 3, 2012), which is within the 180-day application timeframe. An application shield is granted to the facility to allow the facility to operate temporarily after August 22, 2012 until the revised Title V permit is issued.

The application package contained the required forms, appropriately completed and signed, as follows:

400-A	500-C1	500-B	500-MACT
500-A2	500-H	400-CEQA	500-F1

The facility submitted the Title V permit renewal application A/N533073 and a fee of \$1,984.24.

COMPLIANCE RECORD REVIEW:

There are currently no outstanding compliance issues with the facility. The facility was issued 1 Notice of Violation (NOV) and 1 Notice to Comply (N/C) in the last two calendar years. The NOV notice P61605 was issued in April 2014 for not submitting annual emission report for the year of 2013. The facility has submitted the annual report. The case has been closed. The NOC E25614 was issued in April 2014 requesting the facility to demonstrate compliance with, or exemption from, emission limits for boilers rated 1-2 mmbtu/hr and over 15 years old. The facility has complied. The case is closed.

DISCUSSION:

The facility is a junior college located in the downtown Pasadena. The permitted equipment includes two natural gas boilers, six standby generators, a spray booth and a pressure washer. In addition, there is a new diesel emergency engine that Pasadena City College (PCC) installed in November 2009. PCC did not file a permit application for the engine until 2012.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 3
	APPL. NO. 533073	DATE 10/31/2014
	PROCESSED BY LC02	CHECKED BY

Since the initial Title V permit was issued in January 2007 there have been new regulatory requirements and rules revisions. The following discusses the new requirements for the PCC's Title V permit.

- A/N366438-441, Two identical boilers

The two applications are for two identical Springfield natural gas fired boilers. Each is rated at 3,900,000 Btu/hr. They are subject to Rule 1146.1. Since the boilers have been complying with 12 ppmv NOx limit they are not required to do further retrofit. No updates are needed for these two boilers.

- A/N233254, Standby Generator, natural gas

This is a natural gas fired standby generator rated at 100 BHP. There are no updates for this permit.

- A/N290045, 298164, 375255, 375256, 398896, Emergency diesel engines

Rule 1470 – Requirements for Stationary Diesel-Fueled IC Engines

District Rule 1470 applies to the diesel fueled internal combustion engines. The requirements are:

- 1) Use of CARB diesel fuel, consistent with Rule 431.2 requirement
- 2) Subject to Diesel PM standard and hours of operation standards

All the five diesel emergency generators are subject to Rule 1470. The permits have been updated with requirements that are consistent with the PM10 emission rates. The following table illustrates the updated requirement. There are no updates required.

Application	Horsepower	Annual Testing and Maintenance Hours
290045	93	20
298164	65	20
375255	255	20
375256	150	20
398896	91	20

In addition, the facility is within 500 feet of a nearby school St. Philip The Apostle located at 1363 Cordova Street, Pasadena. According to Rule 1470 the engines can not be operated for non-emergency use between the hours of 7:30 a.m. and 3:30 p.m. on days when school is in session.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 4
	APPL. NO. 533073	DATE 10/31/2014
	PROCESSED BY LC02	CHECKED BY

Title 40 Part 60, Subpart IIII – NSPS for IC Engines

This subpart applies only to engines that were installed after April 1, 2006. All the engines were installed prior to 2006. The last engine, A/N398896, was installed in 2002. Thus, the engines are not subject to this subpart.

40 CFR Part 63, Subpart ZZZZ – NESHAP for IC Engines

According to this regulation they are existing emergency compression ignition engines less than 500 HP located at an area source of HAPS. For such an emergency engine the requirements are listed in Table 2d of this subpart. The detailed requirements are:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other requirements including fuel, monitoring, and recording keeping are consistent with Rule 1470 requirements.

- A/N357839, Spray Booth Paint

No updates are required.

- A/N443122, Pressure Washer

No updates are required.

Title V Facility Permit Requirement

This application is submitted as a Title V renewal as required by Rule 3004. As required by Rule 3003, the permit renewal is subject to a 30 day public notice and a 45 day EPA review process. The facility was given a draft copy of the permit to review, prior to issuing the draft for public and EPA review. Any comments received can be referenced in the appendices.

RECOMMENDATION:

After completion of the public notice and EPA review period, a Title V renewal permit should be issued for a new 5 year period, incorporating the above-described changes.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 4	PAGE 5
	APPL. NO. 533073	DATE 10/31/2014
	PROCESSED BY LC02	CHECKED BY

